

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-30060-MAP

JOSEPH F. SCHEBEL, JR.,)
Plaintiff/Pro Se)
)
v.)
)
JOHN MOCCIO, individually and in his official capacity as)
patrolman for the Agawam Police, JOHN KUNASEK, JR.,)
individually and in his official capacity as patrolman for the)
Agawam Police, RICHARD LIGHT, JR., individually and in his)
official capacity as Lieutenant for the Agawam Police, JAMES)
DONOVAN III, individually and in his official capacity as)
Sergeant for the Agawam Police, AGAWAM, CITY of INC.,)
which is duly organized under the laws of the Commonwealth of)
Massachusetts is sued herein in its official capacity as a)
corporation under the laws of the Commonwealth, RICHARD)
COHEN, individually and in his official capacity as Mayor of)
Agawam, Massachusetts, ROBERT CAMPBELL, individually)
and in his official capacity as Chief of Police of Agawam,)
Massachusetts,)
Defendants)

**EMERGENCY MOTION OF THE DEFENDANTS TO EXTEND TIME TO RE-SERVE
WRITTEN DISCOVERY UPON THE PLAINTIFF**

NOW COME the defendants, John Moccio, John Kunasek, Jr., Richard Light, Jr., James Donovan III, City of Agawam, Richard Cohen and Robert Campbell, and request that they be allowed to re-serve their interrogatories and request for production of documents after May 25, 2006 as specified in this court's order, dated May 22, 2006, with regard to plaintiff's opposition to defendant's motion to compel. As reason for this motion, the defendants state that due to an oversight, their counsel did not have an opportunity to re-serve the written discovery, originally served upon the plaintiff on February 6, 2006, by the May 25, 2006 deadline. As a result, the defendants request that they be allowed to re-serve the discovery at this time. The defendants would assent to the plaintiff having additional time to respond to the discovery beyond the current deadline of June 15, 2006.

The Defendants,
JOHN MOCCIO, JOHN KUNASEK, JR., RICHARD
LIGHT, JR., JAMES DONOVAN III, CITY OF
AGAWAM, RICHARD COHEN and ROBERT
CAMPBELL,

By Their Attorneys
MORRISON MAHONEY LLP

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I hereby certify that a true copy of the
above document was served upon (each
party appearing pro se and) the attorney
of record for each (other) party by mail
(by hand) on 6/5/06

Carole